



referencing the paragraph number on the page being cited.

Accordingly, based on the factual and legal grounds stated in the Defendants' accompanying memorandum brief, as supported by the argument and authorities set forth therein and by Defendants' appendix of documentary evidence, Defendants respectfully request that Blanks' summary judgment motion be denied in its entirety, that the Court further grant Defendants' separately filed motion for summary judgment (doc.59) dismissing all claims asserted by Blanks against Defendants, that Defendants be awarded their costs and attorneys fees, and that the Court enter such further orders as may be just and appropriate in the circumstances.

Respectfully Submitted,

s/ Sanford R. Denison  
SANFORD R. DENISON  
Texas Bar No. 05655560  
Baab & Denison, LLP  
Stemmons Place, Suite 1100  
2777 N. Stemmons Freeway  
Dallas, TX 75207  
(214) 637-0750; (214) 637-0730 FAX  
Email: denison@baabdenison.com

COUNSEL FOR UNITED AEROSPACE  
WORKERS LOCAL 848 of the UAW, JAMES  
RUSSELL STROWD, WENDELL HELMS, AND  
ROMEO MUNOZ

DATED: June 21, 2011

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of June, 2011 I electronically filed the forgoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the below listed *pro se* party by electronic means.

A. Cornell Blanks  
P.O. Box 101501  
Fort Worth, Texas 76185

s/ Sanford R. Denison  
SANFORD R. DENISON